

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

RIVERBED TECHNOLOGY, INC.,)	
)	
Plaintiff,)	
)	C.A. No. 08-016-SLR
v.)	
)	
QUANTUM CORPORATION,)	
A.C.N. 120 786 012 PTY, LTD, and)	
ROCKSOFT LTD.,)	
)	
Defendants.)	

DECLARATION OF SHAWN HALL
IN SUPPORT OF DEFENDANTS' MOTION TO DISMISS

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Dated: February 14, 2008
188254.1

1 I, Shawn Hall, state and declare as follows:

2
3 1. I am the Vice President, General Counsel, and Secretary for Quantum
4 Corporation ("Quantum"). I have held this combination of positions at Quantum since January 1,
5 2001. I am over twenty-one years of age and not under any legal disability. I am also a Director
6 of both Rocksoft Limited (now converted to Rocksoft Pty. Limited) ("Rocksoft") and A.C.N. 120
7 786 012 Pty. Ltd. ("A.C.N. 120") I have personal knowledge of the following facts and, if called
8 as a witness, could and would testify competently thereto.

9
10 2. A.C.N. 120 is an Australian company acquired by Quantum on August 22,
11 2006, along with A.C.N. 120's wholly owned subsidiary Rocksoft. Both A.C.N. 120 are
12 incorporated under the laws of Australia and both have their principal places of business in
13 Australia. I am a member of the Board of Directors of both A.C.N. 120 and Rocksoft.

14
15 3. Neither A.C.N. 120 nor Rocksoft maintains offices or other facilities in
16 Delaware. Neither company has a bank account, telephone listing, or an address in Delaware.
17 Neither company has appointed an agent to accept service of process in Delaware.

18
19 4. A.C.N. 120 is a holding company of Quantum that does not produce any
20 products and does not sell any services. Rocksoft provides software-related services to original
21 equipment manufacturers ("OEMs"). Rocksoft does not make, use, sell, or offer to sell products
22 relating to the '810 patent in Delaware. To the best of my knowledge, it has not provided services
23 to any OEM in Delaware.

1
2
3 5. To the best of my knowledge, neither A.C.N. nor Rocksoft has ever sent
4 letters threatening infringement actions concerning the '810 patent to anyone in Delaware or taken
5 other steps to enforce that patent in Delaware. I am certain neither company has taken such action
6 since Quantum's acquisition of A.C.N. 120 in August, 2006.

7
8 I declare under penalty of perjury under the laws of the United States that the
9 foregoing is true and correct and that this Declaration was executed in San Jose, California on
10 February 12, 2008.

11
12
13 By



/s/ Shawn Hall

SHAWN HALL